

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, *et al.*,

*Defendants.*

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Case No. 5:21-cv-844-XR  
[Lead case]

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**STATE DEFENDANTS' DESIGNATION OF REBUTTAL EXPERTS**

Pursuant to this Court's June 8, 2022 Amended Scheduling Order, *see* ECF No. 437, as amended by this Court's February 8, 2023 Order, *see* ECF No. 518, and Text Order of February 21, 2023, the State Defendants file their designation of rebuttal experts.

**DESIGNATION OF TESTIFYING EXPERTS**

1. **Professor Mark Hoekstra.** Professor Hoekstra is the Private Enterprise Research Center Rex B. Grey Associate Professor of Economics at Texas A&M University, a Research Fellow at Institute of Labor Economics, and a Research Associate at the National Bureau of Economic Research. Professor Hoekstra is expected to testify on the impact of SB1 on racial and ethnic minorities, the acceptance and rejection of mail-voting applications and mail ballots, and the conclusions reached in Drs. Hersh, McDaniel, and Grose's expert reports prepared for Plaintiffs.

State Defendants reserve the right to alter, amend, revise, or expand the opinions and expert witness subjects set forth above as necessitated by further discovery or changes in Plaintiffs' expert witness disclosures. State Defendants further note that under this Court's Text Order of February 21, 2023, Plaintiffs have until March 6, 2023, to file Dr. Kenneth Mayer's expert report. State Defendants received a corresponding extension and have until March 27, 2023, to file their rebuttal and accompanying material.

Pursuant to the Court's Scheduling Order, the State Defendants will serve on all parties, but not file, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B).

Date: March 3, 2023

Respectfully submitted.

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#### **CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on March 3, 2023, and that all counsel of record were served by CM/ECF.

/s/ Kathleen T. Hunker  
KATHLEEN T. HUNKER